

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**In re Methyl Tertiary-Butyl Ether
("MTBE") Products Liability Litigation**

) **Master File C.A. No. 1:00-1898**
)
) **MDL 1358 (SAS)**
) **No. M21-88**
)
) **TOTAL PETROCHEMICALS &**
) **REFINING USA, INC.'S RULE 7.1**
) **DISCLOSURE STATEMENT**

This document relates to:

City of Manning v. Ashland Inc. et al., Case No. 1:13-CV-07272 (SAS)
City of Portageville v. Ashland Inc., Case No. 1:13-CV-07299 (SAS)
Hinesburg, Town of v. Atlantic Richfield Company et al., Case No. 1:13-CV-07247 (SAS)
Town of Brewster et al. v. Atlantic Richfield Company et al., Case No. 1:13-CV-07271 (SAS)

**DEFENDANT TOTAL PETROCHEMICALS & REFINING USA, INC.'S
RULE 7.1 DISCLOSURE STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel of record for Defendant Total Petrochemicals & Refining USA, Inc. certifies the following:

Total Petrochemicals & Refining USA, Inc.'s (formerly known as TOTAL PETROCHEMICALS USA, INC.) parent corporation is TOTAL Delaware, Inc. TOTAL Delaware, Inc.'s parent corporation is TOTAL Holdings USA, Inc. TOTAL Holdings USA, Inc.'s parent corporation is TOTAL GESTION U.S.A., which is a French corporation. TOTAL GESTION U.S.A.'s parent corporation is TOTAL S.A., which is also a French corporation. TOTAL S.A. has no parent corporation. No other publicly held corporation owns 10% or more of Total Petrochemicals & Refining USA, Inc.'s stock.

Dated: November 15, 2013

Respectfully submitted,

/s/ M. Coy Connelly

M. Coy Connelly

Amy E. Parker

Kimberly G. Alberts

BRACEWELL & GIULIANI LLP

711 Louisiana St., Suite 2300

Houston, Texas 77002-2770

Telephone: (713) 221-1335

Telecopier: (713) 221-2159

coy.connelly@bgllp.com

ATTORNEYS FOR DEFENDANT

TOTAL PETROCHEMICALS & REFINING

USA, INC.

PROOF OF SERVICE

I hereby certify that a true and correct copy of Defendant Total Petrochemicals & Refining USA, Inc.'s Rule 7.1 Disclosure Statement was served upon all MDL 1358 counsel of record via LexisNexis File & Serve on the 15th day of November, 2013.

/s/ M. Coy Connelly

M. Coy Connelly